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May 11, 2021

VIA ECF

The Honorable Zahid N. Quraishi
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*
Civil Action No. 19-17272-MAS-ZNQ

Dear Judge Quraishi:

This firm represents Defendants in the above-referenced matter. We write jointly on behalf of Defendants, Plaintiffs, and Counterclaim Defendants RIAA and Rightscorp to propose that the Court cancel the teleconference currently scheduled for this Friday, May 14, 2021, at 11:00 a.m. *See* ECF No. 151.

When the Court scheduled the conference, the Court expected to hear argument on written discovery disputes, which the parties were obligated to submit by April 27, 2021. However, the Court subsequently granted the parties' request to extend that deadline to June 28, 2021. *See* ECF No. 153. There are no discovery disputes currently before the Court, and the parties do not have any other matters requiring the Court's attention.

Accordingly, the parties respectfully request that the Court (1) cancel the May 14, 2021 teleconference; and (2) reschedule the conference to a time after the June 28, 2021 deadline for submission of written discovery disputes, so that the Court may hear argument on any such disputes at that time.

We have included a "So Ordered" provision at the end of this letter in the hope that this proposal is acceptable to the Court.

Respectfully Submitted,

/s/

Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF

The above Application is SO ORDERED this ____ day of May, 2021.

The Honorable Zahid N. Quraishi